



# Cooperative Resources International

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DOCKET NO 05-015-1  
REGULATORY ANALYSIS & DEVELOPMENT  
PPD APHIS STATION 3C71  
4700 RIVER ROAD UNIT 118  
RIVERDALE MD 20737-1238

June 29, 2005

RE: Docket No. 05-015-1, *National Animal  
Identification System; Notice of Availability  
of a Draft Strategic Plan and Draft Program  
Standards, Federal Register, May 6, 2005,  
p. 23962.*

Dear Reviewer:

Cooperative Resources International (CRI) submits the following comments as a response to the Strategic Draft Docket No. 05-015-1. CRI is a cooperative owned by 35,000 dairy, beef, sheep, and swine producers, and we serve an additional 10,000 customers. We provide services and products throughout the U.S. and in 55 foreign countries. Our core enterprises are genetic improvement through artificial insemination, dairy management records, and marketing in excess of one million head of livestock through private treaty and five auction facilities.

We were the co-founder and catalyst to launch the Wisconsin Livestock Identification Consortium. We have had a strong interest in national identification for many years. We would provide these comments:

- The Draft Strategic Plan calls for making the entire system mandatory by January 2009. Is a mandatory identification program necessary to achieve a successful animal disease surveillance, monitoring, and response system to support Federal animal health programs? Please explain why or why not.

**CRI totally supports a mandatory system. Anything less illustrates we do not have a national program and opens the U.S. livestock business to greater global scrutiny for food safety. A partial system allows the entire industry to remain at high risk.**

- In the current Draft Strategic Plan, the NAIS would require that producers be responsible for having their animals identified before the animals move to a premises where they are to be commingled with other animals, such as a sale barn. At what point and how should compliance be ensured? For example, should market managers, fair managers, etc., be responsible for ensuring compliance with this requirement before animals are unloaded at their facility or event? Please give the reasons for your response.

**CRI operates one of the largest market operations in the U.S. We recognize the responsibility and feel all producers must have tags prior to delivery. It is a major operational investment to have sale barns read and report all animals. A basic concern is, what responsibility does the sale barn have when animals depart? Is it the new owner's responsibility to record arrival? We would load thousands of animals annually purchased by order buyers and we would not have any idea of destination at departure time.**

- In regard to cattle, individual identification would be achieved with an AIN tag that would be attached to the animal's left ear. It is acknowledged that some producers do not have the facilities to tag their animals; thus, the Draft Program Standards document contains an option for tagging sites, which are authorized premises where owners or persons responsible for cattle could have the cattle sent to have AIN tags applied. Do you think this is a viable option, i.e., can markets or other locations successfully provide this service to producers who are unable to tag their cattle at their farms? Please give the reasons for your response.

**Flexibility at the outset is certainly the appropriate mentality but, frankly, CRI feels every producer should be responsible for each animal's tag. It is close to impossible to visualize this as a function for the markets because such a high percentage of the animals are commingled before they arrive. Actually, we favor tags soon after birth, but at least producer responsibility.**

- The current Draft Strategic Plan does not specify how compliance with identification and movement reporting requirements will be achieved when the sale is direct between a buyer and seller (or through their agents). In what manner should compliance with these requirements be achieved? Who should be responsible for meeting these requirements? How can these types of transactions be inputted into the NAIS to obtain the necessary information in the least costly, most efficient manner?

**Flexibility of processes will be the key issue with the backbone being Web based. Again, CRI believes new owners must be responsible for recording and, in fact, this is true for private and sale barn activity.**

- USDA suggests that animals should be identified anytime prior to entering commerce or being commingled with animals from other premises. Is this recommendation adequate to achieve timely traceback capabilities to support animal health programs or should a timeframe (age limit) for identifying the animals be considered? Please give the reasons for your response.

**CRI would follow the Dutch lead and suggest 48 hours after birth. The point is very clear it should be within an age limit and perhaps 30 days. The sheep scrapies tag is a good example of the problems if it is simply required upon departure of premise.**

- Are the timelines for implementing the NAIS, as discussed in the Draft Strategic Plan, realistic, too aggressive (i.e., allow too little time), or not aggressive enough (i.e., do not ensure that the NAIS will be implemented in a timely manner)? Please give the reasons for your response.

**CRI feels this is realistic and had hoped it would be an earlier date. We recognize the job is enormous, but also are the consequences. At a minimum, retain the current adoption schedule.**

- Should requirements for all species be implemented within the same timelines, or should some flexibility be allowed? Please give the reasons for your response.

**Again, CRI believes there is no choice. We either have a national system or continue to have all producers at risk by association.**

- What are the most cost-effective and efficient ways for submitting information to the database (entered via the Internet, file transfer from a herd-management computer system, mail, phone, third-party submission of data)? Does the type of entity (e.g., producer, market, slaughterhouse), the size of the entity, or other factors make some methods for information submission more or less practical, costly, or efficient? Please provide supporting information if possible.

**In the early stages, the system must accommodate every mode of data transfer including hard copy. Regional centers can and should play a major role in transmission to the federal level. Over time, systems and processes can be forced to be more uniform.**

- We are aware that many producers are concerned about the confidentiality of the information collected in the NAIS. Given the information identified in the draft documents, what specific information do you believe should be protected from disclosure and why?

**CRI believes the basic pieces of information required for tracking do not need to be viewed as confidential. Other optional information must be considered confidential.**

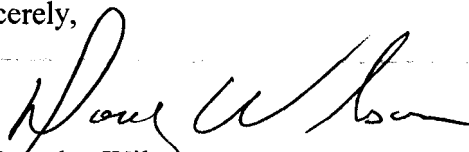
- The NAIS as planned would require States, producers, and other participating entities to provide information and develop and maintain records. How could we best minimize the burden associated with these requirements? For example, should both the seller and the buyer of a specific group of animals report the movement of the animals, or is reporting by one party adequate?

**CRI feels it is the least confusing and least costly if the buyer is responsible to record the movement. In fact, we believe the seller recording adds major confusion and cost as they often would not be able to provide complete information.**

We appreciate the opportunity to respond. If we can be of further value, please contact any of the following:

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Sincerely,



R. Douglas Wilson  
Chief Executive Officer

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